

MAHONEY & KEANE, LLP
Attorneys for Plaintiffs
HAMBURG SÜD NORTH AMERICA, INC.
and HAMBURG SÜD,
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Our File No. 12/3496/B/07/11

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

HAMBURG SÜD NORTH AMERICA, INC. and
HAMBURG SÜD,

Plaintiff(s),

-against-

NEW START SHIPPING SERVICES, INC.,

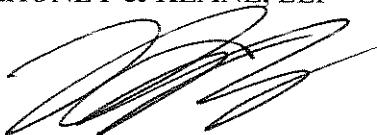
Defendant(s).

Civ. No. 07-05899 (RMB)(JS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that Plaintiffs, HAMBURG SÜD NORTH AMERICA, INC. and HAMBURG SÜD, by their attorneys, MAHONEY & KEANE LLP, will move this Court before the Honorable Renee Marie Bumb, at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101, on August 18, 2008, at 10:00 AM, or as soon thereafter as counsel may be heard for an order, pursuant to Rule 55 of the Federal Rules of Civil Procedure, entering a default judgment in favor of Plaintiff and against Defendant for failing to appear and otherwise defend this action, and for such other and further relief as this Honorable Court may deem just and proper.

Respectfully submitted,
MAHONEY & KEANE, LLP



By: _____

Jorge A. Rodriguez

Dated: New York, New York

July 15, 2008